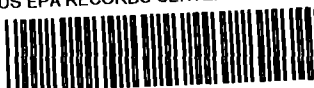


US EPA RECORDS CENTER REGION 5



486154

L. Kimbol
Direct Fax: 214-294-165735307001
Eagle Zinc Co.
SF/Teet

September 14, 2000

Mr. Rick Lanham
Bureau of Land, Federal Site Remediation Section
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

BOSTON

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Re: Eagle Zinc Co., Hillsboro, Illinois

Dear Mr. Lanham:

This letter is in response to your letter to Mary Jo Anzia, P.E. of Environ, dated August 3, 2000, and to memorialize my comments to you during our telephone call on September 5, 2000.

As we discussed, T.L. Diamond & Company ("T.L. Diamond") has preliminarily reviewed your comments on converting the EE/CA workplan submitted by Environ in February into a proposed scope of work to conduct a "focused" remedial investigation/feasibility study (RI/FS) at the Eagle Zinc site. We are disappointed that the Illinois Environmental Protection Agency ("IEPA") continues to require such a Remedial Investigation and reject our proposals to conduct a TACO-based investigation or, as you originally requested, an EE/CA. And more disappointed in the apparent breadth of even a streamlined RI. Although we appreciate your commitment to streamline the process as much as possible; we are still concerned that the RI/FS approach would impose obligations on T.L. Diamond that are beyond its capabilities.

Since the IEPA is insistent on using a traditional Superfund model, we believe it is appropriate to utilize the traditional Superfund approach of inviting all potentially responsible parties to the table to participate. We understand that you are still waiting for 104(c) request responses from Sherwin-Williams and Eagle-Picher. We would request that you postpone any decisions on how to proceed with the RI/FS until it is determined whether they will be asked to participate.

In the interim, T.L. Diamond is continuing to take steps to address conditions at the site. First, T.L. Diamond is moving forward with implementing a stormwater pollution prevention plan in connection with its stormwater discharge permit, including construction of a sedimentation basin to reduce the discharge of pollutants contained in stormwater at the site. In addition, T.L. Diamond is continuing to pursue its request to beneficially reuse clean aggregate for road-bed both on and off-site; thereby reducing the quantity of residuals present on the property.

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Mr. Rick Lanham
September 14, 2000
Page 2

Finally, T.L. Diamond is evaluating some of the interim actions suggested in your comment letter. In particular, we have asked our consultant, Environ, to evaluate the possibility of implementing interim dust control measures at the site.

We request that if this approach is unacceptable to the IEPA, please let us know in advance of taking any action. In any event, I hope that we are able to continue working amicably with the IEPA in addressing site issues.

Sincerely,



Lois Kimbol

LK/jbf

cc: Clarence L. Smith
Terry Ayers
James G. Richardson, Esq.